

IN THE UNITED STATES DISTRICT COURT
FOR THE
MIDDLE DISTRICT OF NORTH CAROLINA
GREENSBORO DIVISION



KENYA TEASLEY,

Plaintiff,

v.

TYLER TECHNOLOGIES, INC., ABIGAIL
DIAZ

Defendants.

1:24-cv-00629

**RESPONSE TO DEFENDANTS'
MOTION TO DISMISS**

Gregory Skidmore is incorrect and should give the Plaintiff all of her credit. The Plaintiff probably sent close to 80 emails because if Tyler Technologies, Inc., think they are going to put false charges on the Plaintiff like it is the 1950's, they are completely out of their mind. As the Plaintiff stated, the longer this libelous information sit, the more damage is being done.

When the Plaintiff saw these files in Tyler's portal, she initially thought this libelous information was related to an expungement she had in 2018 because the libelous file numbers in question, are off by two digits at the end in consecutive order when compared to the two file numbers on the expungement order. The Plaintiff had to go and find her expungement order and contact the attorney who filed her expungement. It was not until then that she realized the libelous offenses in question, are not related to her expungement.

As the Plaintiff stated, these libelous charges were never filed in any NC Court. If these charges had been filed in any Durham County Court, the attorney who handled the Plaintiff's expungement in 2018, would have included them for her expungement and when the time comes he will definitely attest to this. The expunged files are not showing up in the portal created by

Tyler Technologies, Inc. After the Plaintiff's expungement was granted in 2018, the Plaintiff checked all North Carolina government systems and the expunged files were not in any of them.

The retention schedule filed by Gregory Skidmore has a note at the bottom of each page that states the following:

*Pursuant to the [Electronic Records and Imaging Policy](#), if paper files have been scanned in accordance with its procedures, the electronic version becomes the official record copy, and upon NCAOC approval, the original paper files may be destroyed.

There is no electronic version of the libelous files in question because they never existed.

The selected case summaries are not relative to this complaint. They will have to be handled in Durham County District Court, as several rules of Civil Procedure have been broken in regards to motions filed by the Plaintiff. The Plaintiff will have to deal with their drama at another time as she has more pressing issues to handle right now.

PERSONAL JURISDICTION – ABIGAIL DIAZ

This Court has personal jurisdiction over Abigail Diaz. She is listed by name on several filings with the NC Secretary of State, under business search for Tyler Technologies. Therefore, she does business in this State.

ABSOLUTE IMMUNITY

The absolute immunity privilege does not apply to Tyler Technologies. These libelous charges were never filed in any Durham County Court and there was no judicial proceeding for the libelous charges in question.

COMMUNICATIONS DECENCY ACT

This portal created by Tyler Technologies is not Facebook or Instagram. This portal does not include users from all around the world who can post whatever they want. Tyler Technologies website states they may collect information about people and share the information. This is listed under “Tyler as a Controller.” So, Gregory Skidmore needs to ask Tyler Technologies, Inc., why they collect and publish gossip and lies about people without confirming or having proof of the information they publish, and not the Plaintiff. Tyler Technologies, Inc. states the Clerks entered the libelous information into the portal. Aminah Thompson states the libelous information was “migrated” from a system called ACIS into ICMS. Which lie is it? Tyler Technologies Inc. and North Carolina Clerks are the only people who have access to publish information into the portal created by Tyler Technologies, Inc.

Aminah Thompson’s declaration is a lie. The libelous files in question were not “migrated” from the ACIS to any system and are not true and accurate copies of any type of criminal case index records of the Durham County District and Superior Courts. This libelous information was collected and published by Tyler Technologies, Inc.

Please reference Exhibit B and Exhibit C included in Aminah Thompson’s declaration for comparison to Exhibit 1-A filed by the Plaintiff. Exhibit 1-A is a Portal Smart Search record with the same offense and disposition as Exhibit B and Exhibit C. Exhibit 1-A has **very** detailed information all in the Case Summary and other sections that migrated from ACIS into ICMS. Exhibit B and Exhibit C does not have any this. Exhibit 1-A, has arraignment information and the disposition hearing was not held after the case was disposed. The arrest warrant for Exhibit 1-A, was not issued before the indictment. Exhibit B and Exhibit C states the arrest warrant was

issued before the indictment. The paper file for Exhibit 1-A was microfilmed before being destroyed.

Mainly, Exhibit 1-A, has Criminal Process Numbers and an ACIS File Number Key. Exhibit B and Exhibit C does not have either of these.

These libelous files were not migrated from ACIS to any system because an ACIS File Number Key was never created for these libelous charges that were never filed in any Durham County Court. The ACIS File Number Keys for the libelous files in question would have started with (310 – for Durham), followed by (2001 – for the year), (the last six numbers of the file number) and an “S” would have been at the very end to represent Superior Court. Indictments are handled in Superior Court and not District Court.

Aminah Thompson has lied on the Plaintiff by trying to put false charges on her, so we already know where the Plaintiff is going with this. Aminah Thompson’s actions does not surprise the Plaintiff one bit. So far, the Plaintiff has at least 125 people lined up already who will not be voting for her re-election, and Gregory Skidmore couldn’t care less, as he will be somewhere in the wind and not thinking about any local election in Durham.

Aminah Thompson allowed Gregory Skidmore to use her for a plan that backfired and she will now have to explain her lies to a jury. This is where the ball will drop and everything will be told. This however, will not change the fact that she lied and put false charges on the Plaintiff.

The Plaintiff has successfully pled all of the elements for her claims. The libelous publications made by Tyler technologies, Inc. states the Plaintiff was indicted. An indictment is a formal accusation or charge of a crime.

In closing, after the Plaintiff's complaint was assigned to Judge Eagles, the Plaintiff received an email from a Garrett Steadman that stated he represented the Defendants, and that he wanted to know if she consented to an extension for a response. When all of this started before the Plaintiff filed her complaint, Gregory Skidmore was representing the Defendants. When the Plaintiff told Garrett Steadman that she knew he was Judge Eagles Law Clerk from 2019-2020 and that she would be waiting on his Notice of Appearance, the Defendants suddenly brought Gregory Skidmore back in for representation, and the Plaintiff has not heard a word since from Garrett Steadman, nor did he file a Notice of Appearance. Gregory Skidmore and Garrett Steadman work in the same law office. The Plaintiff wonders why Garrett Steadman never filed his Notice of Appearance for this case. She also wonders why the Defendants wanted to swap Gregory Skidmore out for Garrett Steadman.

Kenyaw Teasley
100 Tobler Ct #205
Durham, NC 27704
9/16/2024
Kenya

CERTIFICATE OF SERVICE

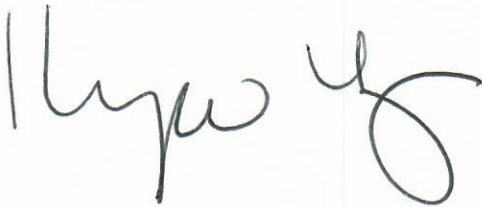
I hereby certify that on this day I mailed a copy of this **RESPONSE TO DEFENDANTS'**
MOTION TO DISMISS to:

Gregory Skidmore

101 North Tryon Street, Suite 1900

Charlotte, NC 28246

This the 16th day of September, 2024.

A handwritten signature in black ink, appearing to read 'Gregory Skidmore', with a stylized flourish at the end.